

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No.: 4:23-cv-05448-YGR-PHK
Case No.: 4:22-md-3047-YGR-PHK

MDL No. 3047

This Filing Relates to:

*People of the State of California, et al. v. Meta
Platforms, Inc., et al.*

Case No.: 4:23-cv-05448

**LETTER TO COURT FILED
PURSUANT TO ECF 1380**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Dear Judge Kang:

In response to the Court's November 26, 2024 Order, below is the text of the email that the Court ordered the undersigned to file on the docket. As an update, since the email below was sent on Friday, November 22, 2024, counsel for the S.C. Attorney General arranged a meet-and-confer call with counsel for Meta and counsel for Governor Henry McMaster and the Office of the Governor of South Carolina (collectively, "Governor McMaster") on November 27, 2024. During this discussion, counsel for Governor McMaster shared that Governor McMaster had authorized them to propose an approach, which would address concerns previously expressed and facilitate the parties' compliance with the Court's Orders. Governor McMaster will utilize, and has already begun utilizing, search terms provided and will produce any relevant and responsive records to the Attorney General, pursuant to a valid records request from the Attorney General, such that the Attorney General may produce such documents to Meta in accordance with the discovery schedule established by the Court. Counsel for the S.C. Attorney General and Meta reached an agreement that they will proceed as outlined above. Accordingly, there is no active dispute regarding the Governor's documents.

Pursuant to your 11/21/2024 court order, ECF 1370, please see the contact information below. The Office of the South Carolina Attorney General does not represent the South Carolina Governor in this matter. It is my understanding that Governor McMaster is the chief decision maker of the Governor's Office and is a licensed attorney. Governor McMaster's contact information is listed below.

The Honorable Henry Dargan McMaster
1100 Gervais Street
Columbia, SC 29201
Office: (803) 734-2100

SC Bar Number: 3895

governormcmaster@governor.sc.gov

Furthermore, the Office of the South Carolina Attorney General cannot speak to any advice given or not given to Governor McMaster. Nonetheless, I have included the contact information I have for the two attorneys in Governor McMaster's Office with whom I have been in contact.

Mr. Thomas Ashley Limehouse, Jr.
Office of the Governor, South Carolina
Chief Legal Counsel, Governor's Office
1100 Gervais Street
Columbia, SC 29201
Office: (803) 734-6023
SC Bar Number: 101289
tlimehouse@governor.sc.gov

Mr. William Grayson Lambert
Office of the Governor
South Carolina State House
1100 Gervais Street
Columbia, SC 29201
Office: (803) 734-2100
SC Bar Number: 101282
glambert@governor.sc.gov

To provide the Court with additional context regarding the position of the Governor's Office in this litigation, I am attaching a letter that our office received on 10/24/2024, a copy of which has previously been provided to Meta's counsel.

Dated: December 2, 2024

Respectfully submitted,

ALAN WILSON
Attorney General
State of South Carolina

/s/ Clark Kirkland, Jr.
C. Havird Jones, Jr.
Senior Assistant Deputy Attorney General
Jared Q. Libet (S.C. Bar No. 74975),
Assistant Deputy Attorney General
Anna C. Smith (SC Bar No. 104749),
Assistant Attorney General
Clark C. Kirkland, Jr. (CA SBN 272522)
Assistant Attorney General
OFFICE OF THE ATTORNEY

GENERAL OF SOUTH CAROLINA

P.O. Box 11549

Columbia, South Carolina 29211

Tel: (803) 734-0057

ckirkland@scag.gov

*Attorneys for Plaintiff the State of South Carolina,
ex rel. Alan M. Wilson, in His Official Capacity as
Attorney General of the State of South Carolina*